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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
ROBB MCWILLIAMS IN FURTHER
SUPPORT OF THE MOTION FOR ENTRY
OF AN ORDER FURTHER EXTENDING
DEADLINE FOR THE REORGANIZED
DEBTORS TO OBJECT TO CLAIMS AND
FOR RELATED RELIEF**

Hearing Information If Timely Response Made:

Date: June 7, 2023

Time: 11:30 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Robb C. McWilliams, hereby declare that the following is true and correct to the best of my
2 knowledge, information and belief:

3 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP, which is an
4 affiliate of both AlixPartners, LLC and AP Services, LLC (collectively, "**AlixPartners**"). AlixPartners
5 provided interim management services to Pacific Gas and Electric Corporation and Pacific Gas and
6 Electric Company, as debtors and reorganized debtors (collectively, the "**Debtors**," and as reorganized
7 pursuant to the Plan, the "**Reorganized Debtors**") in the above-captioned chapter 11 cases (the
8 "**Chapter 11 Cases**"). AlixPartners continues to assist the Reorganized Debtors in resolving the Chapter
9 11 General Claims while also providing support with respect to the Securities Claims. I submit this
10 Declaration in further support of the *Motion for Entry of an Order Further Extending Deadline for the*
11 *Reorganized Debtors to Object to Claims and for Related Relief* (the "**Motion**").¹ In particular, I submit
12 this declaration to update the statistics with respect to the resolution of Securities Claims in the Chapter
13 11 cases.

14 2. In my current position, I am responsible for overseeing the bankruptcy case management
15 component of AlixPartners' assignment to assist the Reorganized Debtors with various matters related
16 to these Chapter 11 Cases. My areas of responsibility include the effort by AlixPartners, in coordination
17 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,
18 other than (a) Fire Claims and Subrogation Wildfire Claims and (b) providing support with respect to
19 Securities Claims. I am generally familiar with the Reorganized Debtors' day-to-day operations,
20 financing arrangements, business affairs, and books and records. Except as otherwise indicated herein,
21 all facts set forth in this Declaration are based upon my personal knowledge, the knowledge of other
22 AlixPartners professionals working under and alongside me on this matter, my discussions with the
23 Reorganized Debtors' personnel and the Reorganized Debtors' various other advisors, and my review of

24 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
25 the Motion and the *Reorganized Debtors' Omnibus Reply in Further Support of Motion for Entry of an*
26 *Order Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related*
27 *Relief* ("**Reply**").

1 relevant documents and information prepared by the Reorganized Debtors. If called upon to testify, I
2 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
3 Declaration in support of the Motion.

4 3. As of Friday, June 2, 2023, the Reorganized Debtors have successfully expunged through
5 objection, reduced through settlement, reconciled and allowed, or otherwise resolved approximately
6 19,933 Claims representing approximately 89% of the total dollar amount of claims asserted in these
7 Chapter 11 Cases (including Securities Claims, but excluding Fire Victim Claims and Subrogation
8 Wildfire Claims).

9 4. Resolved Securities Claims. As of Friday, June 2, 2023 the Reorganized Debtors have
10 successfully expunged through objection, settled, or otherwise resolved approximately 4,841 Securities
11 Claims, approximately 55% of the total Securities Claims. In total, the Reorganized Debtors have made
12 settlement offers as to 5,237 Securities Claims, 2,763 of these claims have been settled by settlement
13 offers, and 774 have been declined. The remaining settlement offers remain outstanding. The
14 Reorganized Debtors have now resolved or made settlement offers to approximately 83% of all
15 Securities Claims.

16 5. During the Fifth Extension Period, the Reorganized Debtors issued settlement offers
17 covering 3,837 Securities Claims and settled 1,735 Securities Claims, a rate of approximately 300
18 Securities Claims per month.

19 6. In the time after the Motion was filed on May 17, 2023, the Reorganized Debtors have
20 issued settlement offers as to 240 Securities Claims and consensually resolved another 183 Securities
21 Claims. The graph attached hereto as Exhibit A provides a summary of Securities Claims resolved since
22 the Effective Date, progress made during the Fifth Extension Period, and additional efforts made since
23 the Motion was filed.

24 7. The response to the settlement offers continues to be positive and the rate of acceptance
25 on settlement offers remains very high, with the exception of the RKS Claimants. Following the hearing
26 on the Motion to Enforce, the Reorganized Debtors issued individual offers to the remaining RKS
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28

1 Claimants. Of the 596 offers sent to RKS Claimants, only five RKS Claimants accepted their offers, five
2 RKS Claimants provided counteroffers and 580 settlement offers were declined without any counter-
3 offers (six RKS Claimants currently have offers outstanding as they requested – and were granted –
4 extensions). In the aggregate, the RKS Claimants have declined 97% of offers they received, and
5 comprise over 80% of all settlement offers declined. Excluding the RKS Claimants, settlement offers
6 relating to 141 claims have been declined. Accordingly, only approximately 3% of the settlement offers,
7 excluding the RKS Claimants, have been declined by Securities Claimants. Of those Securities
8 Claimants who have reviewed their settlement offers, excluding the RKS Claimants, approximately 90%
9 have entered into settlements.

10 8. Remaining Claims. Of the approximately 4,008 Securities Claims that remain unresolved,
11 the Reorganized Debtors have made settlement offers with respect to 1,700 of those claims. Of the
12 remaining Securities Claims, only approximately 1,500 have not received offers. In total, approximately
13 83% of the Securities Claims have received settlement offers or have otherwise been resolved.
14 Approximately 98% of the total potential damages amount of the unresolved Securities Claims reside
15 with 78 individuals or related or affiliated groups.

16 9. Pending Settlement Offers. As of Friday, June 2, 2023, 1,700 settlement offers made by
17 the Reorganized Debtors to the Securities Claimants remain outstanding. The Reorganized Debtors,
18 through AlixPartners, have made significant efforts to encourage those Securities Claimants with
19 outstanding settlement offers to view and make a decision on the offer. AlixPartners' general practice
20 once a settlement offer is sent to a Securities Claimant is to follow-up with a phone call within a week
21 of the offer having been sent to confirm the claimants are aware of the offer. During the 35 day offer
22 window under the Securities Procedures, AlixPartners's practice is to follow-up with two additional
23 phone calls and up to four additional written communications, via email or hardcopy mailing, if the
24 offers remain outstanding during this 35 day window.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief.

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4 Executed June 5, 2023 in Dallas, Texas.

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6 /s/ Robb McWilliams

7 Robb McWilliams
8 Managing Director
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